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SUPREME COURT, U.S.

In The

**SUPREME COURT OF THE UNITED STATES**

October Term, 1989

THE STATE OF IDAHO,

*Petitioner*

vs.

LAURA LEE WRIGHT,

*Respondent***MOTION FOR APPOINTMENT OF COUNSEL  
AND FOR LEAVE TO PROCEED  
IN FORMA PAUPERIS**

RESPONDENT, LAURA LEE WRIGHT moves the Court to appoint counsel to represent her before the Court and to grant her permission to proceed in forma pauperis.

RESPONDENT requests the Court to appoint:

Rolf M. Kehne  
1208 W. State Street  
Boise, Idaho

RESPONDENT relies upon her affidavit and the affidavit of Rolf Kehne in support of this motion.

DATED this 24th day of January, 1990.

Respectfully Submitted;

Rolf M. Kehne  
1208 W. State St.  
Boise, ID 83702  
(208) 342-2272

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**AFFIDAVIT OF ROLF KEHNE  
IN SUPPORT OF MOTION FOR APPOINTMENT OF COUNSEL**

I, Rolf Michael Kehne, being first duly sworn, depose and say that:

1. Respondent, Laura Wright is indigent and requires appointed counsel to represent her before this Court.
2. Laura Wright was represented by a county public defender at trial.

3. I was appointed to represent Ms. Wright on her state appeal and in further state court proceedings.

4. Ms. Wright has asked me to represent her in all proceedings before this Court.

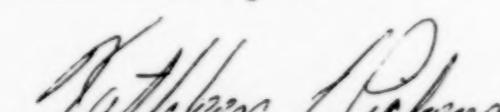
5. I am a member of the Supreme Court bar.

6. I will prepare a brief for Respondent.

7. I have briefed and argued several state court appeals over the last twelve years and I have appeared on petitions filed before this Court.

  
Rolf M. Kehne  
1208 W. State Street  
Boise, ID 83702  
(208) 342-2272

SUBSCRIBED AND SWORN before me this 24th day of January, 1990

  
Kathleen Pickens  
Notary Public for Idaho  
Residing in Boise, Idaho  
My commission expires 11/13/93

IN THE  
SUPREME COURT OF THE UNITED STATES

THE STATE OF IDAHO, )  
Petitioner, ) No. 89-260  
vs. )  
LAURA LEE WRIGHT, )  
Respondent. )

**AFFIDAVIT IN SUPPORT OF MOTION TO PROCEED IN FORMA PAUPERIS**

I, LAURA LEE WRIGHT, being first duly sworn, depose and say that I am the Respondent in the above entitled case; that in support of my motion to proceed without being required to prepay fees, costs or give security therefor, I state that because of my poverty I am unable to pay the costs of said proceeding or to give security therefor; that I believe I am entitled to redress; and that the issues which I desire to present are the following:

A response to the Petition for Writ of Certiorari to the Supreme Court of Idaho filed by the State of Idaho.

I further swear that the responses which I have made to the questions and instruction below relating to my ability to pay the cost of responding to the Petition for Writ of Certiorari to the Supreme Court of Idaho are true.

1. Are you presently employed?

No.

- a. If the answer is yes, state the amount of your salary or wages per month and give the name and address of your employer.
- b. If the answer is no, state the date of your last employment and the amount of the salary and wages per month which you received.

I worked as an inmate for the Idaho State Board of Corrections earning less than \$100.00 per month.

2. Have you received within the past twelve months any income from a business, profession or other form of self-employment, or in the form of rent payments, interests, dividends, or other source?

No.

- a. If the answer is yes, describe each source of income, and state the amount received from each during the past twelve months.

3. Do you own any cash or checking or savings accounts?

No.

- a. If the answer is yes, state the total value of the items owned.

4. Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)?

No.

- a. If the answer is yes, describe the property and state its approximate value.

5. List the persons who are dependent upon you for support and state your relationship to those persons.

None.

I have been continuously incarcerated since I was sentenced for the offence which is the subject of the Petition. I am now in Ada County Jail awaiting retrial. The Idaho Courts found me to be indigent and I was represented by appointed counsel at trial and on appeal in proceedings below.

I understand that a false statement or answer to any questions in this affidavit will subject me to penalties for perjury.

Laura Wright  
LAURA LEE WRIGHT

SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> day of November, 1989.

J.W. J. Justice  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 6-90

CERTIFICATE OF SERVICE

I certify that I hand delivered three (3) copies of the foregoing motion for appointment of counsel and for leave to proceed *in forma pauperis*, along with the supporting affidavits of Laura Wright and Rolf Kehne, to:

Jim Jones  
Attorney General  
M. Stahman  
Deputy Attorney General  
Idaho Statehouse, Room 210  
Boise, Idaho

DATED this 24th day of January, 1990

Respectfully Submitted;



Rolf M. Kehne  
1208 W. State St.  
Boise, ID 83702  
(208) 342-2272